

EXHIBIT “A”

**U.S. District Court
Southern District of New York (Foley Square)
CIVIL DOCKET FOR CASE #: 1:15-cv-01832-VSB**

Brock v. The City Of New York , et al
Assigned to: Judge Vernon S. Broderick
Cause: 42:1983 Civil Rights Act

Date Filed: 03/12/2015
Jury Demand: Both
Nature of Suit: 440 Civil Rights: Other
Jurisdiction: Federal Question

Plaintiff

Kamilah Brock

represented by **Jessica Massimi**

The Richard L. Rosen Law Firm PLLC
110 East 59th Street, #23
New York, NY 10022
212-644-6464
Email: jessicamassimi@msllegal.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Matthew Benjamin Shroyer
Office of Michael S. Lamansoff, PLLC
80 Maiden Lane - 12th Floor
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(212)-962-1020
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TERMINATED: 01/20/2016
LEAD ATTORNEY

Ryan Joseph Lawlor
Law Offices of Michael S. Lamonsoff
80 Maiden Lane, 12th Floor
New York, NY 10038
(212) 962-1020
Fax: (646) 781-3187
Email: rlawlor@msllegal.com
ATTORNEY TO BE NOTICED

V.

Defendant

The City Of New York ,

represented by **Joshua Joseph Lax**

New York City Law Department
100 Church Street
New York, NY 10007
(212) 356-3538
Fax: (212) 788-9776
Email: joshua_lax@hotmail.com

LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

New York City Health and Hospitals Corporation

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Harlem Hospital

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Dr. Elisabeth Lescouflair
Individually

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Dr. Elisabeth Lescouflair
in her official capacity

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Dr. Zana Dobroshi
Individually

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Dr. Zana Dobroshi
in her official capacity

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Dr. Alan Dudley Labor
Individually

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Dr. Alan Dudley Labor
in his official capacity

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

"John Doe" 1-3

*New York City Police Officers; Individually;
the name John Doe being fictitious as the
real names are not presently known
TERMINATED: 03/17/2016*

Defendant**"John Doe" 1-3**

*New York City Police Officers; in their
official capacities; the name John Doe
being fictitious as the real names are not
presently known*

TERMINATED: 03/17/2016

Defendant**Police Officer Salvadore Diaz**

Shield No. 21953, Individually

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant**Police Officer Salvador Diaz**

Shield No. 21953, in his official capacity

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant**Dr. Herman Anderson**

Individually

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant**Dr. Herman Anderson**

in his official capacity

represented by **Joshua Joseph Lax**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
03/12/2015	1	COMPLAINT against "John Doe" 1-3(New York City Police Officers; Individually; the name John Doe being fictitious as the real names are not presently known), "John Doe" 1-3(New York City Police Officers; in their official capacities; the name John Doe being fictitious as the real names are not presently known), Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,. (Filing Fee \$ 350.00, Receipt Number 465401119499)Document filed by Kamilah Brock.(moh) (nm). (Entered: 03/13/2015)
03/12/2015		SUMMONS ISSUED as to "John Doe" 1-3(New York City Police Officers; Individually; the name John Doe being fictitious as the real names are not presently known), "John Doe" 1-3(New York City Police Officers; in their official capacities; the name John Doe being

		fictitious as the real names are not presently known), Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,. (moh) (Entered: 03/13/2015)
03/12/2015		Magistrate Judge Andrew J. Peck is so designated. (moh) (Entered: 03/13/2015)
03/12/2015		Case Designated ECF. (moh) (Entered: 03/13/2015)
03/12/2015	<u>2</u>	CIVIL COVER SHEET filed. (moh) (nm). (Entered: 03/13/2015)
03/17/2015	<u>3</u>	AFFIDAVIT OF SERVICE. The City Of New York, served on 3/12/2015, answer due 4/2/2015. Service was accepted by Betty Mazyck, docket clerk. Document filed by Kamilah Brock. (Shroyer, Matthew) (Entered: 03/17/2015)
03/17/2015	<u>4</u>	AFFIDAVIT OF SERVICE. New York City Health and Hospitals Corporation served on 3/12/2015, answer due 4/2/2015. Service was accepted by Ambrose Blanc, Executive Secretary. Document filed by Kamilah Brock. (Shroyer, Matthew) (Entered: 03/17/2015)
03/17/2015	<u>5</u>	AFFIDAVIT OF SERVICE. Harlem Hospitals served on 3/12/2015, answer due 4/2/2015. Service was accepted by Ambrose Blanc, Executive Secretary. Document filed by Kamilah Brock. (Shroyer, Matthew) (Entered: 03/17/2015)
03/17/2015	<u>6</u>	AFFIDAVIT OF SERVICE. Elisabeth Lescouflair(Individually) served on 3/13/2015, answer due 4/3/2015. Service was accepted by William Ortiz, executive assistant. Document filed by Kamilah Brock. (Shroyer, Matthew) (Entered: 03/17/2015)
03/17/2015	<u>7</u>	AFFIDAVIT OF SERVICE. Zana Dobroshi(in her official capacity) served on 3/13/2015, answer due 4/3/2015. Service was accepted by William Ortiz, executive assistant. Document filed by Kamilah Brock. (Shroyer, Matthew) (Entered: 03/17/2015)
03/17/2015	<u>8</u>	AFFIDAVIT OF SERVICE. Alan Dudley Labor(in his official capacity) served on 3/13/2015, answer due 4/3/2015. Service was accepted by William Ortiz, executive assistant. Document filed by Kamilah Brock. (Shroyer, Matthew) (Entered: 03/17/2015)
03/19/2015		***NOTE TO ATTORNEY TO E-MAIL PDF. Note to Attorney Matthew Benjamin Shroyer for noncompliance with Section 14.2 of the S.D.N.Y. Electronic Case Filing Rules & Instructions. E-MAIL the PDF for Document 1 Complaint,, to: caseopenings@nysd.uscourts.gov. (moh) (Entered: 03/19/2015)
03/19/2015		***NOTICE TO ATTORNEY TO SUBMIT PDF OF CIVIL COVER SHEET. Notice to Attorney Matthew Benjamin Shroyer, to submit PDF of the Civil Cover Sheet. Email a copy of Civil Cover Sheet to: caseopenings@nysd.uscourts.gov. (moh) (Entered: 03/19/2015)
04/03/2015	<u>9</u>	CONSENT LETTER MOTION for Extension of Time to File Answer addressed to Judge Vernon S. Broderick from Joshua J. Lax dated April 3, 2015. Document filed by The City Of New York,. (Lax, Joshua) (Entered: 04/03/2015)
04/06/2015	<u>10</u>	ORDER granting <u>9</u> Letter Motion for Extension of Time to Answer re: <u>1</u> Complaint. Application granted. SO ORDERED. The City Of New York, answer due 6/1/2015. (Signed by Judge Vernon S. Broderick on 4/6/2015) (kl) (Entered: 04/06/2015)
06/02/2015	<u>11</u>	ANSWER to <u>1</u> Complaint,,, with JURY DEMAND. Document filed by Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City

		Health and Hospitals Corporation, The City Of New York,(Lax, Joshua) (Entered: 06/02/2015)
06/12/2015	12	ORDER AND NOTICE OF INITIAL CONFERENCE: It is hereby: ORDERED that counsel for all parties appear for an initial pretrial conference on July 1, 2015 at 11:00 a.m. in Courtroom 518 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York. IT IS FURTHER ORDERED that, by June 24, 2015, the parties submit a joint letter, not to exceed three (3) pages, providing the following information in separate paragraphs as further set forth in this order. Initial Conference set for 7/1/2015 at 11:00 AM in Courtroom 518, 40 Centre Street, New York, NY 10007 before Judge Vernon S. Broderick. (Signed by Judge Vernon S. Broderick on 6/12/2015) (lmb) (Entered: 06/12/2015)
06/23/2015	13	CONSENT LETTER MOTION to Adjourn Conference addressed to Judge Vernon S. Broderick from Joshua J. Lax dated June 23, 2015., CONSENT LETTER MOTION for Extension of Time to File <i>Joint Pre-conference Letter</i> addressed to Judge Vernon S. Broderick from Joshua J. Lax dated June 23, 2015. Document filed by Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,(Lax, Joshua) (Entered: 06/23/2015)
06/24/2015	14	ORDER granting 13 Letter Motion to Adjourn Conference; granting 13 Letter Motion for Extension of Time to File. APPLICATION GRANTED. SO ORDERED. The initial pre-trial conference scheduled for July 1, 2015 is hereby adjourned to July 8, 2015 at 10:00 a.m. The parties shall file their joint letter regarding the status of the case and proposed case management plan on or before July 1, 2015. (Initial Conference set for 7/8/2015 at 10:00 AM before Judge Vernon S. Broderick.) (Signed by Judge Vernon S. Broderick on 6/24/2015) (kl) (Entered: 06/24/2015)
06/29/2015	15	CONSENT LETTER MOTION to Adjourn Conference <i>to a later time on July 8, 2015</i> addressed to Judge Vernon S. Broderick from Joshua J. Lax dated June 29, 2015. Document filed by Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,(Lax, Joshua) (Entered: 06/29/2015)
06/30/2015	16	ORDER granting 15 Letter Motion to Adjourn Conference. Application Granted. The initial pre-trial conference scheduled for July 8, 2015 at 10:00 a.m. is hereby adjourned to July 8, 2015 at 11:30 a.m. SO ORDERED. Initial Conference set for 7/8/2015 at 11:30 AM before Judge Vernon S. Broderick. (Signed by Judge Vernon S. Broderick on 6/30/2015) (ama) (Entered: 06/30/2015)
07/01/2015	17	STATUS REPORT. <i>Joint Status Report</i> Document filed by Kamilah Brock.(Shroyer, Matthew) (Entered: 07/01/2015)
07/08/2015		Minute Entry for proceedings held before Judge Vernon S. Broderick: Initial Pretrial Conference held on 7/8/2015. (msa) (Entered: 07/08/2015)
07/08/2015	18	ORDER REFERRING CASE TO MAGISTRATE JUDGE. Order that case be referred to the Clerk of Court for assignment to a Magistrate Judge for Settlement. Referred to Magistrate Judge Andrew J. Peck. (Signed by Judge Vernon S. Broderick on 7/8/2015) (kgo) (Entered: 07/08/2015)
07/09/2015	19	CASE MANAGEMENT PLAN AND SCHEDULING ORDER: All parties do not consent

		to conducting all further proceedings before a United States Magistrate Judge, including motions and trial, pursuant to 28 U.S.C. § 636(c). This case is to be tried to a jury. The parties have conferred and their present best estimate of the length of trial is two weeks. Amended Pleadings due by 9/7/2015. Joinder of Parties due by 9/7/2015. Deposition due by 1/5/2016. Fact Discovery due by 11/5/2015. Expert Discovery due by 1/5/2016. Discovery due by 1/5/2016. Status Conference set for 1/27/2016 at 10:00 AM before Judge Vernon S. Broderick. (Signed by Judge Vernon S. Broderick on 7/9/2015) (lmb) (Entered: 07/09/2015)
07/16/2015	<u>20</u>	ORDER FOR SETTLEMENT CONFERENCE: Settlement Conference set for 9/8/2015 at 02:00 PM in Courtroom 20D, 500 Pearl Street, New York, NY 10007 before Magistrate Judge Andrew J. Peck. Counsel attending the conference must have full settlement authority and their client(s) must be present at the conference, as must a representative of the client's insurance company where the decision to settle and/or amount of settlement must be approved by the insurance company. Counsel shall provide a confidential settlement memorandum to my chambers. The memorandum shall not be filed with the Clerk of the Court nor provided to opposing counsel. The memorandum should explain the factual and legal background of the case as it impacts on settlement negotiations; the status of prior settlement discussions between the parties; and the party's settlement proposal (range). See Order. (Signed by Magistrate Judge Andrew J. Peck on 7/16/2015) (tn) (Entered: 07/16/2015)
08/13/2015	<u>21</u>	CONSENT LETTER MOTION to Adjourn Conference addressed to Magistrate Judge Andrew J. Peck from Joshua J. Lax dated August 13, 2015. Document filed by Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York.,(Lax, Joshua) (Entered: 08/13/2015)
08/13/2015	<u>22</u>	ORDER granting <u>21</u> Letter Motion to Adjourn Conference. Settle conf. adjourned at defendants request to Sept. 18 at 2PM. Settlement memos due 9/11. This does not extend any discovery or other litigation deadlines. (Settlement Conference set for 9/18/2015 at 02:00 PM before Magistrate Judge Andrew J. Peck.) (Signed by Magistrate Judge Andrew J. Peck on 8/13/2015) (Copies sent by Chambers.) (spo) (Entered: 08/14/2015)
09/11/2015	<u>23</u>	CONSENT LETTER MOTION to Adjourn Conference addressed to Magistrate Judge Andrew J. Peck from Joshua J. Lax dated September 11, 2015. Document filed by Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York.,(Lax, Joshua) (Entered: 09/11/2015)
09/11/2015	<u>24</u>	ORDER granting <u>23</u> Letter Motion to Adjourn Conference: Settlement conf adjourned at Defendant's request to 11/3 at 2PM. Settlement memos due 10/27. This will not be used as a basis to extend any discovery deadline. Settlement Conference set for 11/3/2015 at 02:00 PM before Magistrate Judge Andrew J. Peck. (Signed by Magistrate Judge Andrew J. Peck on 9/11/2015) (tn) (Entered: 09/11/2015)
10/26/2015	<u>25</u>	CONSENT LETTER MOTION to Adjourn Conference <i>sine die</i> addressed to Magistrate Judge Andrew J. Peck from Joshua J. Lax dated October 26, 2015. Document filed by Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City

		Health and Hospitals Corporation, The City Of New York,(Lax, Joshua) (Entered: 10/26/2015)
10/27/2015	<u>26</u>	ORDER granting <u>25</u> Letter Motion to Adjourn Conference: Approved. The November 2, 2015 settlement conference is adjourned. (Signed by Magistrate Judge Andrew J. Peck on 10/27/2015) (tn) (Entered: 10/27/2015)
11/02/2015	<u>27</u>	JOINT LETTER MOTION for Extension of Time to Complete Discovery addressed to Judge Vernon S. Broderick from Joshua J. Lax dated November 2, 2015. Document filed by Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,(Lax, Joshua) (Entered: 11/02/2015)
11/03/2015	<u>28</u>	ORDER granting <u>27</u> Letter Motion for Extension of Time to Complete Discovery. Application granted. The parties shall commit all fact discovery by January 20, 2016, all depositions by January 20, 2016, and all discovery by January 20, 2016. Pre-motion letters shall be submitted by January 27, 2016. The post-discovery conference scheduled for January 27, 2016 at 10:00 a.m. is hereby adjourned until February 3, 2016 at 10:30 a.m. Deposition due by 1/20/2016. Discovery due by 1/20/2016. (Signed by Judge Vernon S. Broderick on 11/3/2015) (lmb) (Entered: 11/03/2015)
11/03/2015		Set/Reset Deadlines: (Fact Discovery due by 1/20/2016.), Set/Reset Hearings:(Status Conference set for 2/3/2016 at 10:30 AM before Judge Vernon S. Broderick.) (lmb) (Entered: 11/03/2015)
12/18/2015	<u>29</u>	ORDER FOR SETTLEMENT CONFERENCE: Settlement Conference set for 1/12/2016 at 10:00 AM in Courtroom 20D, 500 Pearl Street, New York, NY 10007 before Magistrate Judge Andrew J. Peck. Counsel attending the conference must have full settlement authority and their client(s) must be present at the conference, as must a representative of the client's insurance company where the decision to settle and/or amount of settlement must be approved by the insurance company. Counsel shall provide a confidential settlement memorandum to my chambers. The memorandum shall not be filed with the Clerk of the Court nor provided to opposing counsel. The memorandum should explain the factual and legal background of the case as it impacts on settlement negotiations; the status of prior settlement discussions between the parties; and the party's settlement proposal (range). See Order. (Signed by Magistrate Judge Andrew J. Peck on 12/18/2015) (tn) (Entered: 12/18/2015)
01/05/2016	<u>30</u>	CONSENT LETTER MOTION to Adjourn Conference addressed to Magistrate Judge Andrew J. Peck from Joshua J. Lax dated January 5, 2016. Document filed by Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,(Lax, Joshua) (Entered: 01/05/2016)
01/05/2016	<u>31</u>	ORDER granting <u>30</u> Letter Motion to Adjourn Conference: Settlement conf re-scheduled at defendant's request to 1/21 at 9:30 AM. (Settlement memos due 1/14/16) This does not extend any litigation deadlines. Settlement Conference set for 1/21/2016 at 09:30 AM before Magistrate Judge Andrew J. Peck. (Signed by Magistrate Judge Andrew J. Peck on 1/5/2016) (tn) (Entered: 01/05/2016)
01/14/2016	<u>32</u>	NOTICE OF APPEARANCE by Ryan Joseph Lawlor on behalf of Kamilah Brock. (Lawlor, Ryan) (Entered: 01/14/2016)

01/14/2016	33	FIRST LETTER MOTION for Extension of Time to File <i>Settlement Memorandum</i> addressed to Magistrate Judge Andrew J. Peck from Ryan J. Lawlor dated January 14, 2016. Document filed by Kamilah Brock.(Lawlor, Ryan) (Entered: 01/14/2016)
01/15/2016	34	ORDER denying as moot 33 Letter Motion for Extension of Time to File: Moot. (Signed by Magistrate Judge Andrew J. Peck on 1/15/2016) (tn) (Entered: 01/15/2016)
01/19/2016	35	SECOND LETTER MOTION for Extension of Time to Complete Discovery addressed to Judge Vernon S. Broderick from Ryan J. Lawlor dated January 18, 2016. Document filed by Kamilah Brock.(Lawlor, Ryan) (Entered: 01/19/2016)
01/19/2016	36	LETTER addressed to Judge Vernon S. Broderick from Matthew Shroyer dated January 19, 2016 re: Matthew Shroyer no longer associated with Law Office of Michael Lamonsoff. Document filed by Kamilah Brock.(Shroyer, Matthew) (Entered: 01/19/2016)
01/20/2016	37	MEMO ENDORSEMENT on re: 36 LETTER addressed to Judge Vernon S. Broderick from Matthew Shroyer dated January 19, 2016 re: Matthew Shroyer no longer associated with Law Office of Michael Lamonsoff. ENDORSEMENT: In light of Attorney Ryan Lawlor's appearance, (Doc. 32), Attorney Matthew Shroyer's request to withdraw is granted. Attorney Shroyer is relieved from representation in this case. (Attorney Matthew Benjamin Shroyer terminated.) (Signed by Judge Vernon S. Broderick on 1/20/2016) (adc) (Entered: 01/20/2016)
01/20/2016	38	ORDER granting 35 Letter Motion for Extension of Time to Complete Discovery. The deadline for the close of discovery in this matter is hereby extended until March 9, 2016. The post-discovery conference scheduled for February 3, 2016 at 10:30 a.m. is hereby adjourned until April 6, 2016 at 2:30 p.m. Should either party wish to file a pre-motion letter prior to this conference, such letters are due on or before March 23, 2016. Discovery due by 3/9/2016. (Signed by Judge Vernon S. Broderick on 1/20/2016) (lmb) (Entered: 01/20/2016)
01/20/2016		Set/Reset Hearings: Status Conference set for 4/6/2016 at 02:30 PM before Judge Vernon S. Broderick. (lmb) (Entered: 01/20/2016)
01/21/2016		Minute Entry for proceedings held before Magistrate Judge Andrew J. Peck: Settlement Conference held on 1/21/2016. Did not settle. (Gray, Diane) (Entered: 01/21/2016)
02/01/2016	39	NOTICE OF APPEARANCE by Jessica Massimi on behalf of Kamilah Brock. (Massimi, Jessica) (Entered: 02/01/2016)
02/01/2016	40	NOTICE OF CHANGE OF ADDRESS by Jessica Massimi on behalf of Kamilah Brock. New Address: The Law Offices of Michael S. Lamonsoff, PLLC, 32 Old Slip, New York, New York, 10005, 212-962-1020. (Massimi, Jessica) (Entered: 02/01/2016)
03/01/2016	41	THIRD LETTER MOTION for Extension of Time to Complete Discovery , and to Amend the Complaint to name Police Officer Salvador Diaz as a defendant, on consent, addressed to Judge Vernon S. Broderick from Jessica Massimi dated March 1, 2016. Document filed by Kamilah Brock.(Massimi, Jessica) (Entered: 03/01/2016)
03/01/2016	42	FIRST LETTER addressed to Judge Vernon S. Broderick from Jessica Massimi dated March 1, 2016 re: Docket Entry 41. Document filed by Kamilah Brock.(Massimi, Jessica) (Entered: 03/01/2016)
03/02/2016	43	ORDER granting 41 Letter Motion for Extension of Time to Complete Discovery. Application granted. Plaintiff is granted leave to file an Amended Complaint to name Police Officer Salvadore Diaz as a Defendant in this case. The Amended Complaint shall be filed on or before March 11, 2016. Fact discovery in this matter shall end on April 11, 2016, and all discovery shall be completed by June 27, 2016. The post-discovery conference scheduled for April 6, 2016 is hereby adjourned until July 13, 2016 at 10:00

		a.m. The parties shall file either a joint letter updating the status of the case or pre-motion letters on or before June 29, 2016. Amended Pleadings due by 3/11/2016. Discovery due by 6/27/2016. (Signed by Judge Vernon S. Broderick on 3/2/2016) (lmb) (Entered: 03/02/2016)
03/02/2016		Set/Reset Deadlines: (Fact Discovery due by 4/11/2016.), Set/Reset Hearings:(Status Conference set for 7/13/2016 at 10:00 AM before Judge Vernon S. Broderick.) (lmb) (Entered: 03/02/2016)
03/11/2016	<u>44</u>	FILING ERROR - DEFICIENT PLEADING - FILED AGAINST PARTY ERROR FIRST AMENDED COMPLAINT amending <u>1</u> Complaint,,, against Zana Dobroshi(Individually), Harlem Hospitals, Alan Dudley Labor(in his official capacity), Elisabeth Lescouflair(Individually), New York City Health and Hospitals Corporation, The City Of New York,, Salvadore Diaz with JURY DEMAND.Document filed by Kamilah Brock. Related document: <u>1</u> Complaint,,, filed by Kamilah Brock.(Massimi, Jessica) Modified on 3/14/2016 (pc). (Entered: 03/11/2016)
03/14/2016		***NOTICE TO ATTORNEY REGARDING PARTY MODIFICATION. Notice to attorney Jessica Massimi. The party information for the following party/parties has been modified: Harlem Hospitals. The information for the party/parties has been modified for the following reason/reasons: party name contained a typographical error. (pc) (Entered: 03/14/2016)
03/14/2016		***NOTICE TO ATTORNEY REGARDING DEFICIENT PLEADING. Notice to Attorney Jessica Massimi to RE-FILE re: Document No. <u>44</u> Amended Complaint,,. The filing is deficient for the following reason(s): all of the parties listed on the pleading were not entered on CM ECF; the wrong party/parties whom the pleading is against were selected; Salvadore Diaz is listed as Salvador Diaz on the amended complaint caption title. Docket the event type Add Party to Pleading found under the event list Complaints and Other Initiating Documents. Re-file the pleading using the event type Amended Complaint found under the event list Complaints and Other Initiating Documents - attach the correct signed PDF - select the individually named filer/filers - select the individually named party/parties the pleading is against. (pc) (Entered: 03/14/2016)
03/14/2016		ADD PARTY FOR PLEADING. Defendants/Respondents Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,, Salvador Diaz added. Party added pursuant to <u>44</u> Amended Complaint,,. Document filed by Kamilah Brock. Related document: <u>44</u> Amended Complaint,, filed by Kamilah Brock.(Massimi, Jessica) (Entered: 03/14/2016)
03/14/2016	<u>45</u>	FILING ERROR - DEFICIENT PLEADING - FRCP RULE 15 NON-COMPLIANCE - FIRST AMENDED COMPLAINT amending <u>1</u> Complaint against Salvador Diaz, Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York, with JURY DEMAND.Document filed by Kamilah Brock. Related document: <u>1</u> Complaint filed by Kamilah Brock.(Massimi, Jessica) Modified on 3/15/2016 (moh). (Entered: 03/14/2016)
03/15/2016		***NOTICE TO ATTORNEY REGARDING DEFICIENT PLEADING. Notice to Attorney Jessica Massimi re: Document No. <u>45</u> Amended Complaint. The filing is deficient for the following reason(s): opposing party did not consent to the amendment of the pleading; Court's leave has not been granted. File the Exhibit to

Pleading event found under the event list Other Documents and attach either opposing party's written consent or Court's leave. (moh) (Entered: 03/15/2016)		
03/16/2016	46	FIRST AMENDED COMPLAINT amending 45 Amended Complaint,, against Salvador Diaz, Salvadore Diaz, Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York, with JURY DEMAND.Document filed by Kamilah Brock. Related document: 45 Amended Complaint,, filed by Kamilah Brock. (Attachments: # 1 Exhibit A, Letter with consent from Defense counsel)(Massimi, Jessica) (Entered: 03/16/2016)
03/21/2016	47	REQUEST FOR ISSUANCE OF SUMMONS as to Salvador Diaz, re: 46 Amended Complaint,,,. Document filed by Kamilah Brock. (Massimi, Jessica) (Entered: 03/21/2016)
03/22/2016	48	ELECTRONIC SUMMONS ISSUED as to Salvador Diaz. (pc) (Entered: 03/22/2016)
03/25/2016	49	FOURTH LETTER MOTION for Extension of Time to Complete Discovery , <i>jointly submitted</i> addressed to Judge Vernon S. Broderick from Jessica Massimi dated March 25, 2016. Document filed by Kamilah Brock.(Massimi, Jessica) (Entered: 03/25/2016)
03/28/2016	50	ORDER granting 49 Letter Motion for Extension of Time to Complete Discovery. APPLICATION GRANTED. Fact discovery in this matter shall be completed on or before June 10, 2016, and expert discovery shall be completed on or before August 26, 2016. All discovery shall also be completed on or before August 26, 2016 The post-discovery conference scheduled for July 13, 2016 is hereby adjourned until September 14, 2016 at 10:00 a.m. The parties shall file either a joint letter updating the status of the case or pre-motion letters on or before August 31, 2016. (Signed by Judge Vernon S. Broderick on 3/28/2016) (spo) (Entered: 03/28/2016)
03/28/2016		Set/Reset Deadlines: Discovery due by 8/26/2016. Expert Discovery due by 8/26/2016. Fact Discovery due by 6/10/2016. (spo) (Entered: 03/28/2016)
03/28/2016		Set/Reset Hearings: Status Conference set for 9/14/2016 at 10:00 AM before Judge Vernon S. Broderick. (spo) (Entered: 03/28/2016)
04/15/2016	51	SUMMONS RETURNED EXECUTED. Salvador Diaz served on 4/7/2016, answer due 4/28/2016. Service was accepted by Principal Crichlow. Document filed by Kamilah Brock. (Massimi, Jessica) (Entered: 04/15/2016)
06/02/2016	52	CONSENT LETTER MOTION for Extension of Time to Complete Discovery addressed to Judge Vernon S. Broderick from Joshua J. Lax dated June 2, 2016. Document filed by Salvador Diaz, Salvadore Diaz, Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,.(Lax, Joshua) (Entered: 06/02/2016)
06/03/2016	53	ORDER granting 52 CONSENT LETTER MOTION for Extension of Time to Complete Discovery addressed to Judge Vernon S. Broderick from Joshua J. Lax dated June 2, 2016. Document filed by Salvador Diaz, Salvadore Diaz, Zana Dobroshi (in her official capacity), Zana Dobroshi (Individually), Harlem Hospital, Alan Dudley Labor (in his official capacity), Alan Dudley Labor (Individually), Elisabeth Lescouflair (Individually), Elisabeth Lescouflair (in her official capacity), New York City Health and Hospitals Corporation, The City Of New York. Application granted. The post-discovery conference currently scheduled for September 14, 2016 is hereby adjourned until October 12, 2016 at 10:30 a.m. The parties shall file either a joint letter updating the status of the case or pre-

		motion letters on or before September 28, 2016. Application granted. So ordered. (Signed by Judge Vernon S. Broderick on 6/3/2016) (rjm). (Entered: 06/03/2016)
06/03/2016		Set/Reset Deadlines: (Expert Discovery due by 9/23/2016. Fact Discovery due by 7/8/2016.), Set/Reset Hearings: (Post-Discovery Conference set for 10/12/2016 at 10:30 AM before Judge Vernon S. Broderick.) (rjm) (Entered: 06/03/2016)
07/06/2016	54	STIPULATION OF CONFIDENTIALITY AND PROTECTIVE ORDER...regarding procedures to be followed that shall govern the handling of confidential material... (Signed by Judge Vernon S. Broderick on 7/6/2016) (lmb) (Entered: 07/06/2016)
07/07/2016	55	CONSENT LETTER MOTION for Extension of Time to Complete Discovery <i>by One Week</i> addressed to Judge Vernon S. Broderick from Joshua J. Lax dated July 7, 2016. Document filed by Salvador Diaz, Salvadore Diaz, Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,.(Lax, Joshua) (Entered: 07/07/2016)
07/11/2016	56	ORDER granting 55 Letter Motion for Extension of Time to Complete Discovery. Application granted. (Signed by Judge Vernon S. Broderick on 7/11/2016) (lmb) (Entered: 07/11/2016)
07/11/2016		Set/Reset Deadlines: Fact Discovery due by 7/15/2016. (lmb) (Entered: 07/11/2016)
08/24/2016	57	CONSENT LETTER MOTION for Extension of Time to Complete Discovery <i>of Experts</i> addressed to Judge Vernon S. Broderick from Joshua J. Lax dated August 24, 2016. Document filed by Salvador Diaz, Salvadore Diaz, Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,.(Lax, Joshua) (Entered: 08/24/2016)
08/25/2016	58	FILING ERROR - WRONG PDF FILE ASSOCIATED WITH DOCKET ENTRY - CONSENT MOTION to Amend/Correct , <i>to file a Second Amended Complaint.</i> . Document filed by Kamilah Brock. (Attachments: # 1 Exhibit 1, Proposed Second Amended Complaint, # 2 Exhibit 2, Consent to Amend)(Massimi, Jessica) Modified on 9/1/2016 (db). (Entered: 08/25/2016)
08/25/2016	59	ORDER granting 57 Letter Motion for Extension of Time to Complete Discovery. Application granted. Due to the extension of discovery, the deadline for pre-motion letters is moved to November 16, 2016 and the post-discovery conference scheduled for October 12, 2016 at 10:30 a.m. is adjourned until November 30, 2016 at 10:00 a.m. (Signed by Judge Vernon S. Broderick on 8/25/2016) (lmb) (Entered: 08/25/2016)
08/25/2016		Set/Reset Deadlines: (Expert Discovery due by 9/23/2016.), Set/Reset Hearings:(Status Conference set for 11/30/2016 at 10:00 AM before Judge Vernon S. Broderick.) (lmb) (Entered: 08/25/2016)
08/26/2016	60	ORDER granting 58 Motion to Amend/Correct. Application granted. The Clerk of Court is respectfully directed to file the document attached to this letter as Exhibit 1 as Plaintiff's Second Amended Complaint. (Signed by Judge Vernon S. Broderick on 8/26/2016) (lmb) (Entered: 08/26/2016)
08/26/2016	61	SECOND AMENDED COMPLAINT amending 46 Amended Complaint, against Salvador Diaz, Salvadore Diaz, Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth

		Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York, Herman Anderson, Herman Anderson with JURY DEMAND.Document filed by Kamilah Brock. Related document: 46 Amended Complaint, filed by Kamilah Brock.(lmb) (Entered: 08/26/2016)
09/12/2016	62	REQUEST FOR ISSUANCE OF SUMMONS as to Dr. Herman Anderson, re: 61 Amended Complaint,. Document filed by Kamilah Brock. (Massimi, Jessica) (Entered: 09/12/2016)
09/13/2016	63	ELECTRONIC SUMMONS ISSUED as to Herman Anderson(Individually), Herman Anderson(in his official capacity). (pc) (Entered: 09/13/2016)
11/16/2016	64	ANSWER to 61 Amended Complaint,, with JURY DEMAND. Document filed by Salvador Diaz, Salvadore Diaz, Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,.(Lax, Joshua) (Entered: 11/16/2016)
11/16/2016	65	FILING ERROR - WRONG EVENT TYPE SELECTED FROM MENU - LETTER MOTION for Conference <i>Request for Pre-Motion Conference</i> addressed to Judge Vernon S. Broderick from Joshua J. Lax dated November 16, 2016. Document filed by Salvador Diaz, Salvadore Diaz, Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,.(Lax, Joshua) Modified on 12/1/2016 (ldi). (Entered: 11/16/2016)
11/18/2016	66	SUMMONS RETURNED EXECUTED. Herman Anderson(Individually) served on 9/16/2016, answer due 10/7/2016; Herman Anderson(in his official capacity) served on 9/16/2016, answer due 10/7/2016. Service was accepted by Jerry Perez, Risk Management. Document filed by Kamilah Brock. (Massimi, Jessica) (Entered: 11/18/2016)
11/21/2016	67	ORDER granting 65 Letter Motion for Conference Request for Pre-Motion Conference. Plaintiff is directed to submit a response to Defendants' November 16 letter, (Doc. 65), on or before November 24, consistent with Rule 4.A of my Individual Rules. The proposed motion for summary judgment will be discussed at the conference scheduled for November 30, 2016. (Signed by Judge Vernon S. Broderick on 11/21/2016) (cla) (Entered: 11/21/2016)
11/23/2016	68	LETTER RESPONSE in Opposition to Motion addressed to Judge Vernon S. Broderick from Jessica Massimi dated November 23, 2016 re: 65 LETTER MOTION for Conference <i>Request for Pre-Motion Conference</i> addressed to Judge Vernon S. Broderick from Joshua J. Lax dated November 16, 2016. . Document filed by Kamilah Brock. (Massimi, Jessica) (Entered: 11/23/2016)
11/29/2016	69	ANSWER to 61 Amended Complaint,, with JURY DEMAND. Document filed by Herman Anderson(in his official capacity), Salvador Diaz, Salvadore Diaz, Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,.(Lax, Joshua) (Entered: 11/29/2016)
11/30/2016		Minute Entry for proceedings held before Judge Vernon S. Broderick: Status Conference held on 11/30/2016. (Court Reporter Tara Jones) (msa) (Entered: 11/30/2016)

11/30/2016		Set/Reset Deadlines: Motions due by 1/6/2017. Responses due by 2/17/2017 Replies due by 3/3/2017. (msa) (Entered: 11/30/2016)
01/03/2017	70	CONSENT LETTER MOTION for Extension of Time to File <i>Motion for Summary Judgment and Corresponding Dates</i> addressed to Judge Vernon S. Broderick from Joshua J. Lax dated January 3, 2017. Document filed by Herman Anderson(Individually), Herman Anderson(in his official capacity), Salvador Diaz, Salvadore Diaz, Zana Dobroshi(in her official capacity), Zana Dobroshi(Individually), Harlem Hospital, Alan Dudley Labor(in his official capacity), Alan Dudley Labor(Individually), Elisabeth Lescouflair(Individually), Elisabeth Lescouflair(in her official capacity), New York City Health and Hospitals Corporation, The City Of New York,(Lax, Joshua) (Entered: 01/03/2017)
01/04/2017	71	ORDER granting 70 Letter Motion for Extension of Time to File Motion for Summary Judgment and Corresponding Dates. APPLICATION GRANTED. (Signed by Judge Vernon S. Broderick on 1/4/2017) (cla) (Entered: 01/04/2017)
01/04/2017		Set/Reset Deadlines: Motions due by 1/12/2017. Responses due by 2/23/2017 Replies due by 3/9/2017. (cla) (Entered: 01/04/2017)

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